From: **MCCLINCY Matt**

Lori Cora/R9/USEPA/US@EPA; Sean Sheldrake/R10/USEPA/US@EPA To:

Eric Blischke/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA; Kristine Koch/R10/USEPA/US@EPA; Cc:

Peter Battuello; Rene Fuentes/R10/USEPA/US@EPA; ANDERSON Jim M; STRUCK Rodney

RF: Fw: Schedule Subject: 11/22/2005 04:05 PM Date:

Lori.

This is a draft schedule for the upland RI/FS and source control activities. It includes the in-water EE/CA schedule for reference. DEC and ARKEMA have been recalibrating the upland project schedule in an attempt to dovetail with the in-water EE/CA schedule. This has been the main purpose for updating the schedule. Sean participated in the initial discussion with ARKEMA. DEQ and ARKEMA have gone through a couple of iterations since to provide more detail for the upland activities. The schedule is at a point where I wanted to give FED an opportunity to Iterations since to provide more detail for the upland activities. The schedule is at a point where I wanted to give EPA an opportunity to review and ask questions before DEQ approves it. ARKEMA understands that EPA is reviewing it and that additional changes/discussion on the upland schedule may come out of EPA's review. I did not identify a review schedule earlier, but I would ask EPA to complete their review by December 2nd so that we could hold any discussion the first part of the week of December 5th.

With respect to the concern over the source control evaluation schedule, it is my understanding that the EE/CA process and schedule was not flexible enough to prevent the EE/CA from including upland source control measures. That said, ARKEMA is providing monthly status reports on the various source control actions. DEQ and EPA should have a pretty good understanding of the progress on the source control actions long before the formal source control evaluation reports are submitted.

Matt

----Original Message----

From: Cora.Lori@epamail.epa.gov [mailto:Cora.Lori@epamail.epa.gov] Sent: Tuesday, November 22, 2005 2:29 PM
To: Sheldrake.Sean@epamail.epa.gov
Cc: blischke.eric@epamail.epa.gov; humphrey.chip@epamail.epa.gov;
Koch.Kristine@epamail.epa.gov; MCCLINCY Matt; Peter Battuello;

Fuentes.Rene@epamail.epa.gov Subject: Re: Fw: Schedule

Matt: What is the schedule for? All the work Arkema must do or just getting to remedy decisions on the various plumes and other sources? Is it a schedule that will be a part of the voluntary agreement? Is it a part of a document currently under review? Given Sean's initial comments, is it prudent for DEQ to approve this schedule now knowing there are issues related to how it affects the in-water EE/CA? Should DEQ work through this schedule along with the EE/CA schedule under EPA's so we can try to synch up the upland work with the in-water to the maximum extent possible?

Lori Houck Cora Assistant Regional Counsel Office of Regional Counsel U.S. Environmental Protection Agency Region 9, ORC-3 75 Hawthorne Street San Francisco, CA (415) 972-3949 94105 cora.lori@epa.gov

> Sean Sheldrake/R10/US EPA/US

11/22/2005 02:09

humphrey.chip@epamail.epa.gov, blischke.eric@epa.gov, Kristine Koch/R10/USEPA/US@EPA

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cora.lori@epamail.epa.gov, Rene Fuentes/R10/USEPA/US@EPA Subject

Fw: Schedule

Matt, (As discussed today) I've asked parametrix for a specific review, but generally, same comments as before, the s/c evaluation happens too late to be of any use--the ee/ca is going to have to consider s/c options given the lateness of anything emerging on perchlorate specifically, and the lateness of the s/c report in general.

Hopefully the DDT IRM will capture a excavation of the remaining former upland pond area at low groundwater (?)--as we discussed, I don't see much point going around and around on whether the ddt is a problem (modeling), might as well jump to how deep is feasible to dig any hotspots.

Peter, In addition to the basic review, we need to make sure we flag any inconsistencies between this and the master schedule please...

S

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http://yosemite.epa.gov/r10/oea.nsf/webpage/dive+team
http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor
Deliveries: 9th floor mailroom
Visitors: Check-in @ Service Center on 14th floor
----- Forwarded by Sean Sheldrake/R10/USEPA/US on 11/22/2005 01:23 PM

MCCLINCY Matt <MCCLINCY.Matt@d eq.state.or.us>

11/21/2005 01:25

Sean Sheldrake/R10/USEPA/US@EPA

Subject

To

FW: Schedule

Sean,

Attached is the updated upland project schedule for the ARKEMA site which DEQ plans on approving. However, I do want to give you an opportunity to review prior to its acceptance. Please give it a read and call to discuss. Let me know what your schedule for review can manage.

Matt

----Original Message---From: Larry PATTERSON [mailto:larry.patterson@arkemagroup.com]
Sent: Thursday, November 17, 2005 4:48 PM
To: MCCLINCY Matt
Cc: dlivermore@integral-corp.com; Todd SLATER
Subject: Re: Schedule

Attached is the updated schedule. Please call be if you have any questions. (See attached file: Arkema Proposed Schedule Upland & In Water_rev1l1705.pdf)